

JAP:MKM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., §§ 952(a)
and 960)

MAXIMO ANTONIO HERNANDEZ,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW DOYLE, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 14, 2012, within the Eastern District of New York and elsewhere, the defendant MAXIMO ANTONIO HERNANDEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}


1. On or about June 14, 2012, the defendant MAXIMO ANTONIO HERNANDEZ arrived at JFK International Airport ("JFK") in Queens, New York aboard Delta Airlines flight number 550 from Santiago, Dominican Republic.

2. The defendant MAXIMO ANTONIO HERNANDEZ was selected for a Customs and Border Protection ("CBP") enforcement examination of his carry-on luggage. During that inspection, the defendant was asked if the luggage was his and if the contents contained inside were his personal possessions. The defendant responded positively, acknowledging ownership both of a laptop case and a "Club Paris" brand suitcase, as well as the belongings contained therein.

3. During the examination of the suitcase, the CBP officer discovered two thick, square packages wrapped in black plastic. The CBP officer probed the black plastic packages, which produced a white powdery substance. The white powdery substance field tested positive for the presence of cocaine. The total approximate gross weight of the white powdery substance in the suitcase of defendant MAXIMO ANTONIO HERNANDEZ was 2,198.2 grams.

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant MAXIMO ANTONIO HERNANDEZ be dealt with according to law.



MATTHEW DOYLE
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
15th day of June, 2012

HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK